

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO.: 1:22-CV-22671**

DELIO BATISTA,  
CARLOS LOPEZ,  
MARIANA LOPEZ,  
and RAFAELA  
VALIENTE,

Plaintiffs,

vs.

AVANT ASSURANCE  
INC., REINIER CORTES,  
and  
ANDREA GONZALEZ QUINTERO,

Defendants.

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**DECLARATION UNDER PENALTY OF  
PERJURY**

I, REINIER CORTES, being at least 18 years of age, hereby declare based on my personal knowledge:

- I. I am the President at Avant Assurance Inc.
- II. At all times relevant and material to this case, Mariana Lopez was engaged and involved with Avant Assurance Inc solely performing her duties as an independent contractor and before "open enrollment", from November 1st, 2021 – July 11<sup>th</sup>, 2022. Mariana Lopez requested her individual status as a 1099, agreed to be paid via W-9, and on March 8<sup>th</sup>, 2022, requested that Avant pay her company Suprani Service LLC.
- III. At all times relevant and material to this case, Carlos Lopez was engaged and involved with Avant Assurance Inc solely performing his duties as an independent contractor from December 8<sup>th</sup>, 2021 – June 16<sup>th</sup>, 2022. Carlos Lopez requested his individual status as a 1099, agreed to be paid via W-9, and on May 18<sup>th</sup>, 2022, requested that Avant pay his company Carlos Eduardo Lopez Alcala PA.
- IV. At all times relevant and material to this case, Rafaela Valiente was engaged and involved with Avant Assurance Inc solely performing her duties as an independent contractor and before "open enrollment", from November 1st, 2020 – June 23<sup>rd</sup>, 2022. Rafaela Valiente requested her individual status as a 1099, agreed to be paid via W-9, and on March 4<sup>th</sup>, 2021, requested that Avant pay her company Valiente Insurance LLC.
- V. At all times relevant and material to this case, Delio Batista was engaged and involved

with Avant Assurance Inc solely performing his duties as an independent contractor from September 18<sup>th</sup>, 2020 – June 20<sup>th</sup>, 2022. Delio Batista requested his individual status as a 1099 and agreed to be paid via W-9.


I declare under penalty of perjury that the foregoing is true and correct. Executed on May 19<sup>th</sup>, 2023.



SIGNATURE

STATE OF FLORIDA  
COUNTY OF Miami-Dade

The foregoing instrument was acknowledged before me this 19<sup>th</sup> day of May, 2023, by Jennifer A. Manjarres.

  
(Seal) Signature of Notary Public  
Jennifer A. Manjarres  
Produced Identification: ✓  
Type of Identification: Florida Driver's License



**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been furnished via CMF e-filing portal to attorney for Plaintiffs on May 19<sup>th</sup>, 2023.

Respectfully submitted,  
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**DANIEL E. TROPP, ESQ.**  
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